

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

K.A.,

Plaintiff,

v.

MINDGEEK S.A.R.L., et al.,

Defendant.

Case No. 2:24-cv-04786-WLH-ADS

**[PROPOSED] ORDER GRANTING  
DEFENDANT BERND BERGMAIR’S  
APPLICATION FOR LEAVE TO FILE  
UNDER SEAL MATERIAL  
DESIGNATED AS CONFIDENTIAL  
PURSUANT TO A PROTECTIVE  
ORDER**

On January 8, 2025, Defendant Bernd Bergmair filed Defendant Bernd Bergmair’s Application for Leave to File Under Seal Material Designated as Confidential Pursuant to a Protective Order (the “Application”).

The Application seeks leave to file under seal portions of the contemporaneously-filed Defendant Bernd Bergmair’s Reply in Support of Motion to Dismiss Plaintiff’s Complaint (“Bergmair Reply”), which references portions of materials that were previously filed under seal, including: Plaintiff’s Omnibus Opposition to Defendants’ Motions to Dismiss (ECF No. 96-1, “Plaintiff Opp.”); Defendant Bernd Bergmair’s Motion to Dismiss the Second Amended Complaint in *Fleites* (*Fleites* ECF No. 433, “Bergmair *Fleites* Motion”); Exhibits to the Declaration from Ronald G. White in Support of Defendant Bernd Bergmair’s Motion to Dismiss the Second Amended Complaint in *Fleites*

(*Fleites* ECF No. 433-2, “White *Fleites* Decl.”); the Declaration of Andreas Andreou and one attached exhibit, submitted in support of the MindGeek Entity Defendants’ Motion to Dismiss the Second Amended Complaint in *Fleites* (*Fleites* ECF No. 440-2, “Andreou Decl.”); Plaintiff’s Omnibus Opposition to Defendants’ Motions to Dismiss the Second Amended Complaint in *Fleites* (*Fleites* ECF No. 477, “Plaintiff *Fleites* Opp.”); and Defendant Bernd Bergmair’s Reply in Support of Motion to Dismiss Plaintiff’s Second Amended Complaint in *Fleites* (*Fleites* ECF No. 499, “Bergmair *Fleites* Reply” and together with Bergmair Reply, Plaintiff Opp., Bergmair *Fleites* Motion, White *Fleites* Decl., Andreou Decl., Plaintiff *Fleites* Opp., and Bergmair *Fleites* Reply, the “Materials Previously Filed Under Seal”).

The Court, having considered the Application and finding good cause therefor, hereby GRANTS the Application and ORDERS as follows:

1. Portions of the Bergmair Reply which refer to the Materials Previously Filed Under Seal are to be filed under seal.

**IT IS SO ORDERED.**

Dated:

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HON. WESLEY L. HSU  
UNITED STATES DISTRICT JUDGE